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July 21, 2015

VIA ECF AND HAND DELIVERY

Hon. George B. Daniels
United States District Judge
United States District Court
for the Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: *Sokolow, et al. v. Palestinian Liberation Organization, et al.*
Docket No. 04-CV-397 (GBD)(RLE)

Dear Judge Daniels:

I write in anticipation of the conference scheduled for July 28 for the purpose of summarizing the issues that are pending before the Court:

1. **Proposed Judgment and Prejudgment Interest:** Plaintiffs provided the Court with a proposed judgment, DE 826, and then with a corrected proposed judgment reflecting requested pre-judgment interest. DE 884-1.

Following the presentment of the proposed judgment, the parties briefed issues concerning prejudgment interest, primarily:

- a. **Whether the Court should exercise its discretion to award prejudgment interest.**
- b. **If so, what interest rate should the Court select.**

DE 829, 830, 888, 890. When the Court issues a decision on those two questions, plaintiffs will promptly submit a proposed judgment that conforms to the Court's decisions.

2. **Motion for a New Trial or a Judgment Notwithstanding the Jury Verdict:** Defendants moved for a new trial or judgment notwithstanding the jury verdict under Rules 50 and 59. They also moved to re-re-

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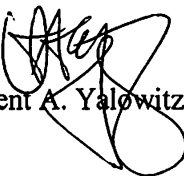
consider the Court's jurisdictional decisions. DE 896. Plaintiffs opposed. DE 918. Defendants replied. DE 923.

3. **Motion for a Stay and Application for an Order to Deposit Funds into the Registry of the Court:** Defendants moved for a stay of execution of the judgment. DE 897-99. Plaintiffs opposed. DE 920-21. Defendants replied. DE 925.

On the same day that plaintiffs opposed the motion for a stay, plaintiffs also applied by proposed order to show cause for an order requiring defendants to deposit funds into the registry of the Court. *See* Letter from Kent A. Yalowitz to Hon. George B. Daniels (May 29, 2015), with accompanying proposed order to show cause and declaration of Kent A. Yalowitz in support of application; *see also* DE 920-21. Defendants' responsive papers showed a refusal to post any security. DE 925. Plaintiffs replied. DE 928-31.

4. **Letter Motion to Strike Purported "Defendants' Trial Exhibits":** The only "Defendants' Trial Exhibits" that should be filed for the record on defendants' expected appeal are 17, 71, 72, 73, 74, and 75. The remainder were never even offered in evidence and should be expunged from defendants' inexplicable "notices of filing." DE 905-11. Plaintiffs asked the Court to strike the non-trial exhibits in the filing. DE 915. Defendants opposed. DE 916. Plaintiffs replied. DE 917. Defendants surreplied. DE 919.

Respectfully,


Kent A. Yalowitz

cc: All ECF Counsel